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6 Attorney for Mark Han
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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 MARK HAN,

14 Defendant.
15

Case No. 2:14-cr-278-JAD-VCF

AMENDED UNOPPOSED MOTION
TO CONTINUE SELF
SURRENDER DATE
(2ND REQUEST)

16 Comes now the defendant, Mark Han, by and through his counsel of record, Raquel
17 Lazo, Assistant Federal Public Defender, and hereby moves this court for an order to continue
18 his self-surrender date for sixty (60) days. This request is based on the Points and Authorities
19 attached hereto.
20

21 DATED this 2nd of February, 2016
22

23 RENE L. VALLADARES
24 Federal Public Defender
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26 By: /s/Raquel Lazo

RAQUEL LAZO
Assistant Federal Public Defender
Attorney for Mark Han

POINTS AND AUTHORITIES

1. Mr. Han is required to voluntarily surrender on February 23, 2015. *See Minutes (#42).*

2. Mr. Han previously requested a continuance of his self-surrender date to permit him to finish a project with his employer, Joshua Gust. There were a few delays with the project. Mr. Han's employer has now secured the contract with the client and desires Mr. Han's assistance to finalize the terms of the contract. The opportunity to finish this project will also permit Mr. Han the ability to earn some extra money to be saved and used for when he is released from custody. It is anticipated that this is a contract and client that Mr. Han will continue to work on from within custody (on a limited basis) and after he is released from his term of incarceration.

3. Mr. Han's Pretrial Services Officer, Kamu Kapanui, has no opposition. Mr. Han is in full compliance.

4. The government also has no opposition.

Respectfully submitted,

By: /s/Raquel Lazo

RAQUEL LAZO
Assistant Federal Public Defender
Attorney for Mark Han

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,
Plaintiff,
v.
MARK HAN,
Defendant.

Case No. 2:14-cr-278-JAD-VCF

PROPOSED ORDER

MARK HAN,

Defendant.

IT IS HEREBY ORDERED that Defendant Mark Han, have his self-surrender day continued to April 23, 2016.

DATED this 3rd day of February, 2016.

UNITED STATES DISTRICT JUDGE

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3 **CERTIFICATE OF ELECTRONIC SERVICE**

4 The undersigned hereby certifies that he is an employee of the Federal Public Defender
5 for the District of Nevada and is a person of such age and discretion as to be competent to
6 serve papers.

7 That on January 21, 2016, he served an electronic copy of the above and foregoing
8 Unopposed Motion to Continue Self Surrender Date by electronic service (ECF) to the person
9 named below:

10
11 DANIEL G. BOGDEN
12 United States Attorney
13 Amber Craig
Assistant United States Attorney
333 Las Vegas Blvd. So. 5th Floor
14 Las Vegas, NV 89101

15 */s/ Brandon Thomas*
Employee of the Federal Public Defender

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